

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

<i>In re</i>	:	Chapter 11
	:	Case No. 01-01139 (JKF)
W. R. GRACE and CO., <i>et al.</i> <sup>1</sup> ,	:	(Jointly Administered)
	:	
Debtors.	:	Objection Deadline: December 13, 2005
	:	Hearing Date: TBD, if necessary

**FEE DETAIL FOR PITNEY HARDIN LLP'S  
FIFTY-SECOND INTERIM FEE APPLICATION FOR THE PERIOD  
FROM SEPTEMBER 1, 2005 THROUGH SEPTEMBER 30, 2005**

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace and Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace and Co.-Conn., A-1 Bit and Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., EandC Liquidating Corp., Emerson and Cuming, Inc.), Southern Oil, Resin and Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

# EXHIBIT A

**EXHIBIT A****FEES FOR THE FEE PERIOD SEPTEMBER 1, 2005 THROUGH SEPTEMBER 30, 2005<sup>2</sup>**

Client: 082910 W.R. GRACE &amp; CO.

Matter: 065656 Weja, Inc.

09/01/05	Review correspondence.		
14	W. Hatfield	0.1	33.50
09/01/05	Receipt and review of letter from F. Biehl re anticipated receipt of additional monies from CNA in payment of Teich judgment.		
14	R. Gottilla	0.2	73.00
09/13/05	Address case materials.		
14	W. Hatfield	0.3	100.50
09/13/05	Receipt and review of letter from F. Biehl enclosing payment received from CNA; preparation of file memo.		
14	R. Gottilla	0.3	109.50
09/14/05	Address case issues.		
14	W. Hatfield	0.2	67.00
09/15/05	Telephone conversation with F. Biehl re: payment of additional funds on account of judgment forthcoming from insurance carriers within 2 weeks.		
14	R. Gottilla	0.2	73.00
09/20/05	Receipt and review of letter from F. Biehl enclosing additional payment on Teich judgment; preparation of file memo.		
14	R. Gottilla	0.3	109.50
09/21/05	Review correspondence on Teich payments.		
14	W. Hatfield	0.1	33.50

**FEE SUMMARY - SORTED BY TIMEKEEPER**

<u>Timekeeper</u>	<u>TASK CODE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEE</u>
R. Gottilla	14	1.0	365.00	365.00

<sup>2</sup> Legend for Pitney Hardin LLP's fees:

3 = Litigation, category 15

18 = Fee Application (Applicant), category 11

14 = Case Administration, category 4

W. Hatfield	14	0.7	335.00	234.50
	TOTAL	1.7		599.50

Client: 082910 W.R. GRACE & CO.  
Matter: 095992 Chapter 11 Administration

09/23/05	Draft fee application for July 2005.		
18	K. Jasket	2.8	658.00
09/26/05	Drafted fee application for July 2005 and forward to S. Zuber for review.		
18	K. Jasket	1.5	352.50
09/27/05	Review and revise July, 2005 Fee Application.		
18	S. Zuber	0.3	112.50
09/30/05	Revise July 2005 fee application and attention to sending same to D. Carickhoff for filing.		
18	K. Jasket	0.5	117.50

## FEE SUMMARY - SORTED BY TIMEKEEPER

<u>Timekeeper</u>	<u>TASK</u> <u>CODE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEE</u>
S. Zuber	18	0.3	375.00	112.50
K. Jasket	18	4.8	235.00	1,128.00
	TOTAL	5.1		1,240.50

Client: 082910 W.R. GRACE & CO.  
Matter: 114715 NJDEP v. W.R. Grace et al.

09/01/05	Meeting with M. Waller re: strategy/status.		
14	P. Herzberg	0.3	118.50
09/01/05	Work with attorneys re: action items on discovery issues.		
14	A. Marchetta	1.0	525.00
09/01/05	Prepare e-mail messages to W. Jacobson re: joint defense agreement and interview of James Cintani, and to R. Senfleben and counsel for individual defendants to discuss a motion to stay or otherwise obtain additional time from AG's office to respond to the Complaint.		
3	M. Waller	0.8	300.00
09/01/05	Follow up with M. Morgan regarding motion for additional time to respond to complaint.		
3	M. Waller	0.3	112.50

09/01/05	Review notice that PA/SI report was served and acceptance by State.		
3	M. Waller	0.1	37.50
09/01/05	Draft status and strategy motion to A. Marchetta re: motion seeking additional time to respond to complaint, forwarding documents to NJDEP that were served pursuant to AG's subpoenas, and call to DAG Dickinson.		
3	M. Waller	0.6	225.00
09/01/05	Meeting with A. Marchetta and M. Morgan regarding status and strategy and call to R. Senftleben regarding conference call to discuss approach.		
3	M. Waller	0.6	225.00
09/01/05	Review response from W. Jacobson stating proposed changed re: independence of counsel proposed by PH were "unnecessary" and were not included in joint defense agreement and discuss same with A. Marchetta.		
3	M. Waller	0.2	75.00
09/01/05	Draft e-mail to client and co-counsel regarding conference call to discuss motion to extend time to answer and approach to AG's office regarding same.		
3	M. Waller	0.1	37.50
09/01/05	Work with M. Morgan regarding production of materials to NJDEP, document review, and preparing documents in response to subpoenas.		
3	M. Waller	0.7	262.50
09/01/05	Reviewing transcripts of interviews with various former employees.		
3	M. Waller	1.0	375.00
09/01/05	Further review of supplemental documents produced by HRO and follow up with M. Waller re: production.		
14	M. Morgan	3.7	740.00
09/01/05	Review the rules of court to determine the time available to make a motion for additional time to respond to the complaint and confer with M. Waller re: same.		
14	M. Morgan	0.2	40.00
09/01/05	Meeting with A. Marchetta and M. Waller regarding motion to stay and motion to extend time.		
14	M. Morgan	0.6	120.00
09/01/05	Work with R. McCaffery and Y. Day regarding production of documents.		
3	S. Muhlstock	0.2	54.00
09/01/05	Review five sets of the transcripts of former-employee interviews and		

3	compare accuracy of same with hand-written notes. J. Mandel	1.2	324.00
09/01/05	Substantive review of production documents and organize into specified categories.		
3	J. Mandel	2.0	540.00
09/01/05	Reviewed, categorized and organized documents provided by WR Grace, and managed document sets to aid with responses to subpoenas and preparation for other document requests.		
3	A. Stahl	2.0	380.00
09/01/05	Redact documents for on-going subpoena response.		
14	Y. Day	3.0	330.00
09/01/05	Review documents and database entry.		
14	C. Atkins	1.5	127.50
09/01/05	Document review, analysis and coding into database.		
14	G. Hammoud	7.0	1,365.00
09/01/05	Review documents and separate into categories by relevance. Identify documents responsive to subpoena from New Jersey Attorney General and redact where appropriate.		
14	R. McCaffrey	7.0	1,190.00
09/02/05	Lengthy conference call with client and attorneys and follow up with Deputy Attorney General re: same; prepare papers re: motion.		
14	A. Marchetta	2.4	1,260.00
09/02/05	Draft memorandum summarizing results of status and strategy conference call re: motion for additional time and motion to stay.		
3	M. Waller	0.5	187.50
09/02/05	Drafting additions and revisions to letter to NJDHHS in response to request for information re: former employees and distribute letter to client with explanatory memo.		
3	M. Waller	0.6	225.00
09/02/05	Work with M. Morgan to prepare documents requested by T. Frongillo and draft e-mail forwarding same.		
3	M. Waller	0.4	150.00
09/02/05	Prepare for and participate in conference call with A. Marchetta and M. Morgan, with co-counsel and client, regarding motion for additional time and to permit motion for stay, and follow up with DAG Dickinson and draft		

3	summary of same. M. Waller	2.3	862.50
09/02/05	Working with M. Morgan regarding memorandum of law in support of motion to extend time to respond to the complaint.		
3	M. Waller	1.0	375.00
09/02/05	Telephone conference with W. Jacobson regarding pleading issues (stay vs. seeking additional time) and Grand Jury testimony.		
3	M. Waller	0.4	150.00
09/02/05	Review and revise letter to NJDHHS re: former employees information, follow up with M. Morgan regarding same and forward for comment by e-mail.		
3	M. Waller	0.8	300.00
09/02/05	Review memorandum from J. Mandel regarding transcripts of interviews with various former employees.		
3	M. Waller	0.1	37.50
09/02/05	Follow up memo to M. Morgan regarding response to NJDHHS request for information regarding former employees and additional information from B. O'Connell and follow up with R. Marriam.		
3	M. Waller	0.3	112.50
09/02/05	Participate in call to DAG Dickinson with A. Marchetta re: seeking additional time to respond to complaint in light of anticipated motions to stay in bankruptcy action and by individual defendants.		
3	M. Waller	0.2	75.00
09/02/05	Research issues on Statute of Limitations, Ex Post Facto issues, and applicable crimes based on time periods.		
3	J. Mandel	1.5	405.00
09/02/05	Substantive review of production documents and organization into specified categories.		
3	J. Mandel	2.2	594.00
09/02/05	Further research and prepare motion to extend time to answer complaint and work with M. Waller re: same.		
14	M. Morgan	2.4	480.00
09/02/05	Prepare for and participate in conference call with M. Waller, A. Marchetta and R. Sentfleben regarding motion to stay, motion to extend time.		
14	M. Morgan	2.0	400.00

09/02/05	Compile documents cited in civil penalties complaint for T. Frongillo and follow up with M. Waller re: same.		
14	M. Morgan	0.8	160.00
09/02/05	Work on document production of 8/31/05 for delivery to the DEP and co-counsel.		
14	Y. Day	4.2	462.00
09/02/05	Review documents and database entry.		
14	C. Atkins	3.0	255.00
09/02/05	Review documents responsive to subpoena issued by New Jersey Attorney General. Review documents for privilege and redaction, where appropriate.		
14	R. McCaffrey	6.5	1,105.00
09/02/05	Document review, analysis and coding into database.		
14	G. Hammoud	7.0	1,365.00
09/03/05	Further prepare Motion to Extend Time to Answer to Civil Complaint.		
14	M. Morgan	4.2	840.00
09/03/05	Further research and prepare motion to extend time to answer to complaint.		
14	M. Morgan	4.3	860.00
09/03/05	Review documents and database entry.		
14	C. Atkins	4.0	340.00
09/04/05	Work with M. Morgan regarding brief in support of application for additional time to respond to complaint and draft additions and revisions to same		
3	M. Waller	2.0	750.00
09/04/05	Further research, prepare and revise Motion to Extend Time to Answer to Civil Complaint with M. Waller.		
7	M. Morgan	5.3	1,060.00
09/05/05	Draft additions and revisions to draft brief in support of request for additional time to respond to the Complaint and follow up with M. Morgan regarding same, including memo pointing out revisions.		
3	M. Waller	2.4	900.00
09/05/05	Conduct meeting with review team regarding various document issues.		
3	S. Muhlstock	1.0	270.00
09/05/05	Conferences with M. Waller regarding document review issues.		
3	S. Muhlstock	0.5	135.00



09/05/05	Draft and revise letter for filing of second stipulation extending time to answer. Attend to filing same.		
3	S. Muhlstock	0.4	108.00
09/05/05	Review comments from M. Waller and prepare and revise Motion to Extend Time to Answer to Civil Complaint.		
14	M. Morgan	4.7	940.00
09/05/05	Draft additions and revisions to memorandum of law in support of defendants' motion to extend time, including Marchetta Certification and proposed notice of motion.		
14	M. Morgan	3.3	660.00
09/06/05	Follow up re: brief on motion to stay and 105; follow up re: interviews and documents.		
14	A. Marchetta	1.1	577.50
09/06/05	Review and respond to e-mail from F. McTiernan regarding requested documents.		
3	M. Waller	0.2	75.00
09/06/05	Review motion to stay from counsel for R. Bettacchi.		
3	M. Waller	0.2	75.00
09/06/05	Review comments from various counsel to brief and motion papers in support of application for additional time and work with M. Morgan to incorporate same into brief.		
3	M. Waller	1.2	450.00
09/06/05	Review e-mails and follow up with L. Coppola and M. Morgan regarding additional documents received from HRO and coding and incorporating same into database.		
3	M. Waller	0.2	75.00
09/06/05	Telephone conference among joint defense counsel regarding motion seeking additional time, to stay NJ proceeding, and 105 motion and draft follow up e-mail to A. Marchetta.		
3	M. Waller	1.1	412.50
09/06/05	Review comments to brief and e-mail regarding same from S. Engel and follow up with M. Morgan regarding same.		
3	M. Waller	0.5	187.50
09/06/05	Drafting additions and revisions to draft brief seeking additional time and confer with M. Morgan re: finalizing brief.		

3	M. Waller	0.8	300.00
09/06/05	Telephone conference with R. Marriam regarding production of employee information to NJDHHS and drafting summary of same.		
3	M. Waller	0.3	112.50
09/06/05	Drafting additions and revisions to brief in support of motion for additional time.		
3	M. Waller	1.0	375.00
09/06/05	Follow up with M. Morgan and A. Marchetta regarding draft brief in support of motion for additional time.		
3	M. Waller	0.4	150.00
09/06/05	Review fully executed stipulation extending time for Grace and other defendants to respond to complaint and follow up with S. Muhlstock re: filing of same.		
3	M. Waller	0.1	37.50
09/06/05	Review and follow up to e-mail memos regarding redaction of non-Trenton related documents with M. Morgan and Y. Day.		
3	M. Waller	0.2	75.00
09/06/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas and preparation for other document requests.		
3	A. Stahl	0.8	152.00
09/06/05	Research several issues related to criminal complaint under N.J.S.A. 2C:17-2 for preparation of memorandum on same, including ex post facto, degree crime and penalty based on when conduct committed, and admissibility of prior bad acts for conduct occurring before certain amendments to statute.		
3	J. Mandel	2.0	540.00
09/06/05	Incorporate comments received from M. Waller and Grace team regarding Motion to Extend time to Answer.		
14	M. Morgan	1.9	380.00
09/06/05	Compile productions made to DAG Bonanno to forward to Joshua Gradwohl.		
14	M. Morgan	2.1	420.00
09/06/05	Attention to issues regarding redaction of documents to be produced in response to subpoena.		
3	S. Muhlstock	0.4	108.00

09/06/05	Work with M. Waller regarding redaction issue and J. Burrill's files.		
3	S. Muhlstock	0.3	81.00
09/06/05	Continue review of documents for responsiveness to subpoenas.		
3	S. Muhlstock	3.3	891.00
09/06/05	Work on document production of 8/31/05 for delivery to the DEP and co-counsel.		
14	Y. Day	5.0	550.00
09/06/05	Redact documents for on-going production to DAG in response to subpoena.		
14	Y. Day	0.8	88.00
09/06/05	Review documents and database entry.		
14	C. Atkins	5.0	425.00
09/06/05	Meeting with M. Waller and document review team to discuss status.		
14	R. McCaffrey	0.5	85.00
09/06/05	Review and analysis of all aspects of database to verify accuracy and formatting of dates, names, document titles, attachments, and all substantive information, and making corrections and additions as necessary.		
14	G. Hammoud	2.0	390.00
09/06/05	Document review, analysis and coding into database.		
14	G. Hammoud	6.0	1,170.00
09/06/05	Review documents for responsiveness to subpoena from New Jersey Attorney General and redact where appropriate. Review documents for attorney client or work product privilege.		
14	R. McCaffrey	6.5	1,105.00
09/07/05	Work with M. Morgan and M. Waller re: motion for extension and production issues.		
14	A. Marchetta	1.0	525.00
09/07/05	Follow up re: issues in response to Grand Jury Subpoena.		
14	A. Marchetta	0.6	315.00
09/07/05	Review revised brief from M. Morgan and prepare revisions.		
3	M. Waller	1.6	600.00
09/07/05	Review suggested revisions to brief from E. McTiernan, reply to same and incorporate comments into brief.		
3	M. Waller	0.4	150.00

09/07/05	Review e-mail with suggested revisions to brief from W. Jacobson and reply to same and review response to e-mail from A. Marchetta regarding suggested revisions.		
3	M. Waller	0.2	75.00
09/07/05	Review subpoena from NJAG's office and draft memorandum to client and co-counsel regarding same.		
3	M. Waller	0.3	112.50
09/07/05	Review and finalize brief in support of extension for additional time and forward with e-mail to client and co-counsel.		
3	M. Waller	0.9	337.50
09/07/05	Review final comments to brief from all counsel and work with various counsel regarding signatures.		
3	M. Waller	0.7	262.50
09/07/05	Receive telephone call from L. Sinanyan regarding removal and transfer motion and research forms for same in connection with bankruptcy actions		
3	M. Waller	0.8	300.00
09/07/05	Draft e-mail regarding and forwarding various removal forms to L. Sinanyan.		
3	M. Waller	0.2	75.00
09/07/05	Review bankruptcy order and memorandum from J. Baer regarding exceptions to the 30-day period permitted to file motions to remove, draft follow up memo to A. Marchetta regarding same.		
3	M. Waller	0.3	112.50
09/07/05	Follow up with S. Muhlstock regarding response to latest subpoena from NJAG's office		
3	M. Waller	0.3	112.50
09/07/05	Reviewing documents for responsiveness to subpoena and make determinations re: specific documents pulled by document review team.		
3	M. Waller	0.8	300.00
09/07/05	E-mails with Y. Day regarding redaction of documents to be produced in response to subpoena.		
3	S. Muhlstock	0.1	27.00
09/07/05	Continue review of documents for responsiveness to subpoenas and follow up with M. Waller re: latest subpoena.		
3	S. Muhlstock	2.8	756.00

09/07/05	Further review supplemental production of documents received from HRO.		
14	M. Morgan	2.6	520.00
09/07/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas and preparation for other document requests.		
3	A. Stahl	1.9	361.00
09/07/05	Redact documents for on-going production to DAG in response to subpoena; exchange e-mails re: redacting procedures with S. Muhlstock.		
14	Y. Day	6.6	726.00
09/07/05	Review documents for responsiveness to subpoena from New Jersey Attorney General and separate documents by relevant category, redact documents where appropriate.		
14	R. McCaffrey	7.0	1,190.00
09/07/05	Document review, analysis and coding into database.		
14	G. Hammoud	7.0	1,365.00
09/08/05	Follow up re various issues in case; papers filed with court; strategy issues.		
14	A. Marchetta	0.6	315.00
09/08/05	Review e-mail from L. Sinanyan requesting information for use in preparing motion for removal and follow up with S. Muhlstock regarding same.		
3	M. Waller	0.3	112.50
09/08/05	Review summary of testimony of J. Cintani before grand jury.		
3	M. Waller	0.2	75.00
09/08/05	Review e-mail from M. Morgan and L. Coppola re: additional documents received from HRO and scanning and coding of same and follow up with S. Muhlstock regarding same.		
3	M. Waller	0.2	75.00
09/08/05	Work with M. Morgan to prepare information requested by L. Sinanyan for motions to remove and transfer.		
3	M. Waller	0.3	112.50
09/08/05	Review e-mail from R. Marriam re: ruling by client to produce social security numbers in response to request for former employee information from NJDHHS.		
3	M. Waller	0.1	37.50

09/08/05	Prepare for and participate in meeting with document and substantive review team regarding completing document review and substantive review, and response to latest subpoena.		
3	M. Waller	0.7	262.50
09/08/05	Prepare sample of motion to transfer for L. Sinanyan and forward same with e-mail.		
3	M. Waller	0.4	150.00
09/08/05	Draft e-mail to co-counsel requesting information for motions to remove and transfer.		
3	M. Waller	0.1	37.50
09/08/05	Draft e-mail memorandum to L. Sinanyan forwarding requested information.		
3	M. Waller	0.2	75.00
09/08/05	Telephone conference with L. Sinanyan and review e-mail and sample auto-referral motion and draft memo to S. Zuber regarding same for DNJ Bankruptcy Court.		
3	M. Waller	0.4	150.00
09/08/05	Review follow up memo from L. Sinanyan re: auto-referral to bankruptcy court in DNJ Bankruptcy Court and forward to S. Zuber.		
3	M. Waller	0.2	75.00
09/08/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas and preparation for other document requests.		
3	A. Stahl	0.8	152.00
09/08/05	Continue review of documents for responsiveness to subpoenas.		
3	S. Muhlstock	1.4	378.00
09/08/05	E-mails and conferences with M. Waller regarding removal issues.		
3	S. Muhlstock	0.5	135.00
09/08/05	Substantive review of documents and organize into specified categories.		
3	J. Mandel	2.2	594.00
09/08/05	Further review of supplemental documents received from HRO.		
14	M. Morgan	2.4	480.00
09/08/05	Research regarding whether Grace can remove beyond the 30-day time line set forth in 1446 due to a standing order in the bankruptcy code and work with M. Waller re: motion to remove.		

14	M. Morgan	1.8	360.00
09/08/05	Redact documents for on-going production to DAG in response to subpoena.		
14	Y. Day	6.5	715.00
09/08/05	Review documents and database entry.		
14	C. Atkins	3.0	255.00
09/08/05	Substantive review of documents for responsiveness to subpoena from New Jersey Attorney General, redact documents where appropriate and review for possible attorney client or work product privileges.		
14	R. McCaffrey	7.0	1,190.00
09/08/05	Document review, analysis and coding into database.		
14	G. Hammoud	7.0	1,365.00
09/09/05	Review and analysis of removal and jurisdictional issues, including review of Bankruptcy Rules, NJ Local Rules, and caselaw, and discussions with M. Waller; and prepare short memo on issues.		
14	S. Zuber	1.7	637.50
09/09/05	Follow up with counsel for J. Burrill re: dates of service for use in removal papers.		
3	M. Waller	0.2	75.00
09/09/05	Receive telephone call from R. Senftleben regarding production of documents by J. Alvarez, follow up telephone conference with R. Finke regarding same, and review subpoena and documents received from J. Alvarez.		
3	M. Waller	0.8	300.00
09/09/05	Receive fully executed certification submitted by URS with cover letter and distribute via e-mail.		
3	M. Waller	0.2	75.00
09/09/05	Follow up with L. Coppola regarding preparation of additional boxes received from HRO for substantive review and review e-mail from L. Coppola regarding same.		
3	M. Waller	0.1	37.50
09/09/05	Forward files received from J. Alvarez to client and co-counsel.		
3	M. Waller	0.1	37.50
09/09/05	Review information provided by T. Frongillo re: service and address for R. Bettacchi for inclusion in removal papers.		

3	M. Waller	0.1	37.50
09/09/05	Draft memo to L. Sinanyan with information to include in removal papers and follow up conferences with same.		
3	M. Waller	0.7	262.50
09/09/05	Follow up with L. Sinanyan regarding preparation of removal papers.		
3	M. Waller	0.2	75.00
09/09/05	Follow up re: research concerning standing order of referral from district court to bankruptcy court.		
3	M. Waller	0.2	75.00
09/09/05	Follow up with M. Morgan regarding call to B. O'Connell re: documents that appear missing from production and review e-mail to same.		
3	M. Waller	0.2	75.00
09/09/05	Follow up with S. Zuber regarding process to refer from district court to bankruptcy court.		
3	M. Waller	0.7	262.50
09/09/05	Draft e-mail memorandum to L. Sinanyan regarding referral process in NJ for bankruptcy actions removed to district court.		
3	M. Waller	0.3	112.50
09/09/05	Telephone conference with R. Senftleben, W. Jacobson and T. Mace regarding scope of recent subpoena issued by NJAG's office		
3	M. Waller	0.4	150.00
09/09/05	Telephone conference with DAG Bonanno regarding scope of recent subpoena and meeting, if necessary, prior to seeking indictment.		
3	M. Waller	0.3	112.50
09/09/05	Draft memorandum summarizing telephone conference with DAG Bonanno regarding subpoena and meeting, if necessary, prior to seeking indictment.		
3	M. Waller	0.3	112.50
09/09/05	Review e-mail and drafts of removal papers from L. Sinanyan preparing suggested revisions.		
3	M. Waller	0.9	337.50
09/09/05	Follow up with S. Zuber regarding exceptions to direct referral process and draft e-mail memorandum to L. Sinanyan explaining same.		
3	M. Waller	0.4	150.00
09/09/05	Review various issues and follow up with M. Waller re same re: production		



	and motion to transfer.		
14	A. Marchetta	0.3	157.50
09/09/05	Review Grace Supplemental PAR; telephone conference with M. Waller re: documents offered in Supplemental PAR.		
14	P. Herzberg	0.4	158.00
09/09/05	Review interview transcripts of Duncan Murphy, Richard Taylor, Sherwood Rice, John Gellan and James Heleg.		
14	P. Herzberg	1.2	474.00
09/09/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas.		
3	A. Stahl	2.8	532.00
09/09/05	Substantive review of documents and organize into specified categories, with focus on latest subpoena.		
3	J. Mandel	1.0	270.00
09/09/05	Further review of supplemental documents received from HRO in response to subpoenas.		
14	M. Morgan	2.1	420.00
09/09/05	Further review of supplemental documents in response to subpoenas.		
14	M. Morgan	1.2	240.00
09/09/05	Begin review of additional client documents for the purposes of organization and determining responsiveness to subpoenas.		
3	S. Muhlstock	0.5	135.00
09/09/05	Redact documents for on-going production to DAG in response to subpoena.		
14	Y. Day	3.0	330.00
09/09/05	Copy redacted documents to file for production to DEP and co-counsel.		
14	Y. Day	0.8	88.00
09/09/05	Review documents for responsiveness to subpoenas from New Jersey Attorney General and organize documents by relevant category.		
14	R. McCaffrey	7.0	1,190.00
09/09/05	Document review, analysis and coding into database.		
14	G. Hammoud	6.5	1,267.50
09/09/05	Work with vendor to create a load file format for documents to be loaded into Summation.		

14	C. Warnke	0.3	43.50
09/10/05	Review e-mails and follow up re: discussions with Bonanno.		
14	A. Marchetta	0.3	157.50
09/12/05	Follow up re: e-mails re: document production.		
14	A. Marchetta	0.4	210.00
09/12/05	Exchange e-mails with R. Senftleben re: draft e-mail memorandum to B. O/Connell and finalize and send same.		
3	M. Waller	0.4	150.00
09/12/05	Review e-mail and follow up with L. Coppola regarding coding, staffing, and status of entry of documents into database.		
3	M. Waller	0.2	75.00
09/12/05	Distribute memorandum re: J. Cintani's testimony and follow up with P. Herzberg regarding same.		
3	M. Waller	0.2	75.00
09/12/05	Review RPC 4.2 briefing filed in connection with the MT action from W. Jacobson as the arguments may related to application of the same and similar RPC's under NJ law.		
3	M. Waller	0.3	112.50
09/12/05	Follow up with S. Zuber regarding removal papers and forward research and memo from L. Sinanyan.		
3	M. Waller	0.7	262.50
09/12/05	Follow up with W. Jacobson regarding substantive document review and research issues.		
3	M. Waller	0.1	37.50
09/12/05	Review employee list prepared by Y. Day and note revisions to same for purposes of letter to NJDHHS.		
3	M. Waller	0.3	112.50
09/12/05	Review documents, coding, and follow up with review team re: production of information pursuant to subpoenas.		
3	M. Waller	2.1	787.50
09/12/05	Review and respond to memorandum from W. Jacobson regarding substantive review of documents.		
3	M. Waller	0.2	75.00
09/12/05	Work with S. Zuber re: follow up with bankruptcy court clerk regarding		

3	direct removal and forward orders in Grace bankruptcy. M. Waller	0.2	75.00
09/12/05	Continued review and analysis of removal issues and confer with M. Waller re: same.		
14	S. Zuber	0.8	300.00
09/12/05	Continue review of client documents for the purposes of organization and determining responsiveness to subpoenas.		
3	S. Muhlstock	1.2	324.00
09/12/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas.		
3	A. Stahl	2.7	513.00
09/12/05	Substantive review of documents and organization into specified categories, with focus on new subpoena.		
3	J. Mandel	1.5	405.00
09/12/05	Research void for vagueness doctrine as applied to widespread destruction charge.		
3	J. Mandel	0.4	108.00
09/12/05	Document review, analysis, and coding into Summation database.		
14	Y. Day	1.5	165.00
09/12/05	Review and analysis of Summation database to verify accuracy and make corrections or additions as necessary.		
14	Y. Day	1.9	209.00
09/12/05	Compile list of Trenton site employees, date of employment and social security numbers from payroll records.		
14	Y. Day	3.0	330.00
09/12/05	Review documents for responsiveness to subpoenas from New Jersey Attorney General, including September 7, 2005 Subpoena. Separate documents into categories by relevance. Enter document information into database.		
14	R. McCaffrey	8.0	1,360.00
09/12/05	Document review, analysis and coding into database.		
14	G. Hammoud	9.0	1,755.00
09/12/05	Document review, analysis and coding into database.		
14	C. Warnke	2.9	420.50

09/13/05	E-mails and follow up re:105 Application and Subpoena.		
14	A. Marchetta	0.7	367.50
09/13/05	Several calls with L. Sinanyan regarding removal and referral issues.		
14	S. Zuber	0.7	262.50
09/13/05	Continued review and analysis of procedural issues related to removal and referral and follow up regarding notice of removal and related papers and follow up with M. Waller re: same.		
14	S. Zuber	2.3	862.50
09/13/05	Review letter from DAG Dickinson indicating State would not oppose motion for additional time to respond to complaint and forward that with comment to client and co-counsel.		
3	M. Waller	0.2	75.00
09/13/05	Review draft letter to NJDHHS re: employee information.		
3	M. Waller	0.3	112.50
09/13/05	Review e-mail from B. O'Connell regarding production of documents and review of additional documents in Cambridge.		
3	M. Waller	0.1	37.50
09/13/05	Telephone conference with B. O'Connell regarding production of documents and review of additional documents in Cambridge.		
3	M. Waller	0.3	112.50
09/13/05	Finalize removal papers.		
3	M. Waller	1.8	675.00
09/13/05	Follow up with S. Zuber regarding procedures for removal.		
3	M. Waller	0.3	112.50
09/13/05	Review e-mail memorandum from L. Sinanyan regarding removal papers and revisions to same and review attachments.		
3	M. Waller	0.4	150.00
09/13/05	Follow up exchange of e-mail from S. Zuber and L. Sinanyan regarding finalizing removal and transfer papers.		
3	M. Waller	0.3	112.50
09/13/05	Follow up with M. Morgan regarding telephone conference with T. Mace, HRO, and client regarding document review and response to recent subpoena from AG's office.		
3	M. Waller	0.4	150.00

09/13/05	Review exchange of e-mail memos from S. Zuber and L. Sinanyan regarding filing procedures re: removal to bankruptcy court and respond to S. Zuber re: same.		
3	M. Waller	0.3	112.50
09/13/05	Review documents reviewed by document team re: production pursuant to subpoenas.		
3	M. Waller	0.9	337.50
09/13/05	Review e-mail from W. Jacobson regarding deposition of W. Corcoran re: expansion plants and Trenton and follow up memo to A. Marchetta and P. Herzberg regarding same.		
3	M. Waller	0.3	112.50
09/13/05	Follow up with A. Marchetta regarding motion to extent time and follow up with DAG Dickinson.		
3	M. Waller	0.1	37.50
09/13/05	Draft e-mail to L. Sinanyan forwarding removal papers and explaining revisions.		
3	M. Waller	0.2	75.00
09/13/05	Sort new discovery materials from original production into more specified categories, with focus on new subpoena.		
3	J. Mandel	1.0	270.00
09/13/05	Continue review of client documents for the purposes of organization and determining responsiveness to subpoenas.		
3	S. Muhlstock	1.9	513.00
09/13/05	Conferences with J. Spielberg, A. Stahl and R. McCaffery regarding review of client documents for the purposes of organization and determining responsiveness to subpoenas.		
3	S. Muhlstock	0.5	135.00
09/13/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas and preparation for other document requests and confer with S. Muhlstock re: same.		
3	A. Stahl	4.4	836.00
09/13/05	Compile list of Trenton site employees, date of employment, social security numbers and last known address from payroll records.		
14	Y. Day	3.5	385.00
09/13/05	Document review, analysis and coding in Summation database.		
14	Y. Day	3.2	352.00

09/13/05	Substantive review of documents. Review documents for responsiveness to all subpoenas issued by New Jersey Attorney General. Separate documents into categories by relevance. Enter information regarding documents into database.		
14	R. McCaffrey	7.5	1,275.00
09/13/05	Document review, analysis and coding into database.		
14	G. Hammoud	7.8	1,521.00
09/13/05	Document review, analysis and coding into database.		
14	C. Warnke	4.4	638.00
09/14/05	E-mail to and from M Waller re: DEP regulatory changes.		
3	P. Herzberg	0.5	197.50
09/14/05	Review and analysis of draft motion for injunction, and discuss same with A. Marchetta and M. Waller.		
14	S. Zuber	1.3	487.50
09/14/05	Conference call with L. Sinanyan and M. Waller regarding removal and jurisdictional issues.		
14	S. Zuber	0.5	187.50
09/14/05	Various correspondence to and from, and calls with, L. Sinanyan regarding proposed changes to revised Notice of Removal.		
14	S. Zuber	0.8	300.00
09/14/05	Review, analysis and revision of draft Notice of Removal, and follow up with A. Marchetta and M. Waller.		
14	S. Zuber	1.7	637.50
09/14/05	Review e-mails and follow up with M. Waller re: AUSA investigation.		
14	A. Marchetta	0.4	210.00
09/14/05	Follow up with S. Zuber re: 105 Motion.		
14	A. Marchetta	0.3	157.50
09/14/05	Review 105 motion and discuss with S. Zuber.		
3	M. Waller	0.6	225.00
09/14/05	Review final removal papers from L. Sinanyan.		
3	M. Waller	0.3	112.50
09/14/05	Review e-mail summarizing telephone call from AUSA Calcagni and forward to litigation team with comment.		

3	M. Waller	0.2	75.00
09/14/05	Review documents identified by team as responsive re: production pursuant to subpoenas.		
3	M. Waller	1.9	712.50
09/14/05	Telephone conference with W. Jacobson regarding presentation for 9/26 meeting with client and co-counsel.		
3	M. Waller	0.2	75.00
09/14/05	Follow up with S. Zuber regarding basis for removal and removing to bankruptcy court.		
3	M. Waller	0.1	37.50
09/14/05	Review and finalizing letter to NJDHHS with M. Morgan and e-mail to client regarding same.		
3	M. Waller	0.3	112.50
09/14/05	Follow up with M. Morgan regarding certificate of service and filing fee to court.		
3	M. Waller	0.2	75.00
09/14/05	Reviewing brief in support of 105 motion and follow up with A. Marchetta and S. Zuber re: review of same.		
3	M. Waller	0.4	150.00
09/14/05	Reviewing recent proposed rule making by NJDEP concerning ISRA and draft follow up e-mail to P. Herzberg re: same.		
3	M. Waller	0.4	150.00
09/14/05	Reviewing memo from P. Herzberg re: recent proposed rule making by NJDEP concerning ISRA		
3	M. Waller	0.1	37.50
09/14/05	Analyzing briefs by US associated with motions to disqualify counsel being paid by a co-defendant in the McWane matter and draft memorandum to W. Jacobson summarizing need to revise joint defense agreement in light of anticipated US attorneys to do same in this matter.		
3	M. Waller	1.1	412.50
09/14/05	Confer with S. Zuber regarding additions and revisions to removal papers and discuss with A. Marchetta.		
3	M. Waller	0.5	187.50
09/14/05	Telephone conference to L. Sinanyan with S. Zuber regarding additions and revisions to removal papers.		

3	M. Waller	0.4	150.00
09/14/05	Review revised paragraphs to removal papers from L. Sinanyan and follow up with S. Zuber and work with same to prepare final revisions.		
3	M. Waller	0.4	150.00
09/14/05	Compile employee information for NJDHSS and coordinate same with Robert Marriam.		
14	M. Morgan	2.0	400.00
09/14/05	Further compile employee information in response to NJDHSS letter, and work with M. Waller in connection with same.		
14	M. Morgan	1.8	360.00
09/14/05	Substantive review of documents and organization into specified categories, with focus on new subpoena.		
3	J. Mandel	1.5	405.00
09/14/05	Document review, analysis and coding into database.		
14	Y. Day	6.6	726.00
09/14/05	Database entry		
14	C. Atkins	4.0	340.00
09/14/05	Document review, analysis and coding into database.		
14	G. Hammoud	7.6	1,482.00
09/14/05	Review documents for responsiveness to subpoenas from New Jersey Attorney General. Code documents and enter information into database. Separate documents into categories by relevance.		
14	R. McCaffrey	7.2	1,224.00
09/14/05	Worked on printing out new documents to be loaded into Summation.		
14	C. Warnke	0.6	87.00
09/14/05	Document review, analysis and coding into database.		
14	C. Warnke	1.3	188.50
09/15/05	Conference call and follow up re: AUSA case and issues/strategy.		
14	A. Marchetta	1.8	945.00
09/15/05	Finalize letter to DHHS re: request for employee information.		
3	M. Waller	0.4	150.00
09/15/05	Review e-mail from counsel to R. Bettacchi re: 105 motion, review revisions proposed by same and draft memo to S. Zuber re: same.		



3	M. Waller	0.5	187.50
09/15/05	Follow up with S. Engel regarding additions and revisions to memorandum of law in support of 105 motion and exchange of e-mails with Engel regarding same.		
3	M. Waller	0.3	112.50
09/15/05	Researching EPA's first notice of asbestos contamination at the Hamilton site pursuant to conference call with client and co-counsel and telephone conference with R. Marriam regarding same.		
3	M. Waller	1.1	412.50
09/15/05	Draft memorandum regarding EPA's first notice of asbestos at Hamilton site.		
3	M. Waller	0.6	225.00
09/15/05	Prepare outline and participate in meeting with S. Muhlstock, M. Morgan and document/substantive review team re: preparation of chronologies by subject matter for 9/26 meeting with client and co-counsel.		
3	M. Waller	0.8	300.00
09/15/05	Reviewing documents to determine responsiveness to subpoenas and for use in chronologies.		
3	M. Waller	1.0	375.00
09/15/05	Prepare for conference call with client and co-counsel with A. Marchetta and participate in same.		
3	M. Waller	1.2	450.00
09/15/05	Review defense themes from Libby as received from L. Urgenson and follow up with S. Muhlstock regarding same.		
3	M. Waller	0.3	112.50
09/15/05	Review revised employee list from M. Morgan and respond re: information to provide in response to DHHS request.		
3	M. Waller	0.3	112.50
09/15/05	Review letter from DAG Dickinson re: motion for additional time.		
3	M. Waller	0.1	37.50
09/15/05	Meeting with K. Drew regarding review of documents to be produced by NJDEP in response to OPRA requests and follow up telephone call to D. Levithan regarding same		
3	M. Waller	0.8	300.00
09/15/05	Follow up call from D. Levithan re: review of documents at NJDEP.		

3	M. Waller	0.2	75.00
09/15/05	Review e-mail from L. Sinanyan and motion to transfer venue and follow up with S. Zuber regarding same.		
3	M. Waller	0.2	75.00
09/15/05	Review latest draft of Removal papers.		
14	S. Zuber	0.3	112.50
09/15/05	Correspondence from and to L. Sinanyan, and call with L. Sinanyan, regarding motion to transfer venue.		
14	S. Zuber	0.3	112.50
09/15/05	Conference with discovery team.		
3	J. Mandel	0.3	81.00
09/15/05	Substantive review of documents and organize into specified categories, with focus on new subpoena.		
3	J. Mandel	2.0	540.00
09/15/05	Organize and review client documents for the purposes of preparing a chronology regarding key events and documents.		
3	S. Muhlstock	4.4	1,188.00
09/15/05	Review documents and database entry.		
14	C. Atkins	2.0	170.00
09/15/05	Review documents for responsiveness to subpoenas from New Jersey Attorney General. Meeting with Mike Waller and document review team to discuss summary of documents. Review plant performance documents and separate by year and category.		
14	R. McCaffrey	9.5	1,615.00
09/15/05	Work with M. Waller re: Chronology.		
14	G. Hammoud	0.7	136.50
09/15/05	Review, analysis, and sorting of documents for purposes of compiling a chronology of events relevant to the Federal investigation.		
14	G. Hammoud	3.9	760.50
09/15/05	Document review, analysis and coding into database.		
14	G. Hammoud	4.4	858.00
09/15/05	Document review, analysis and coding into database.		
14	C. Warnke	4.8	696.00

09/16/05	Conference call with S. Engel and M. Waller regarding Sec. 105 injunction papers and venue transfer motion.		
14	S. Zuber	0.7	262.50
09/16/05	Review and revise draft motion to transfer venue from NJ District Court to DE Bankruptcy Court.		
14	S. Zuber	0.6	225.00
09/16/05	Work with M. Waller re: interviews and investigation for strategy meeting, joint defense agreement and chronology.		
14	A. Marchetta	1.2	630.00
09/16/05	Telephone conference with J. O'Reilly regarding tolling and interview issues.		
3	M. Waller	0.4	150.00
09/16/05	Draft memo to A. Marchetta regarding tasks and issues in connection with 9/26 client and co-counsel meeting.		
3	M. Waller	0.4	150.00
09/16/05	Prepare for conference call to S. Engel with S. Zuber and participate in same regarding motion to transfer and 105 motion.		
3	M. Waller	0.7	262.50
09/16/05	Follow up with R. McCaffrey and S. Muhlstock regarding preparation of site chronology for 9/26 meeting.		
3	M. Waller	0.3	112.50
09/16/05	Review comments from co-counsel to motions to remove and transfer.		
3	M. Waller	0.3	112.50
09/16/05	Review e-mail memorandum from W. Jacobson regarding the Joint Defense Agreement and draft memorandum to A. Marchetta and J. O'Reilly regarding proposal to revise same.		
3	M. Waller	0.3	112.50
09/16/05	Review and analyze suggested edits to 105 motion by counsel for R. Bettacchi and draft memorandum to Grace co-counsel group regarding same.		
3	M. Waller	0.6	225.00
09/16/05	Work with A. Marchetta regarding additions and revisions to 105 motion and conference call with S. Engel regarding same.		
3	M. Waller	0.4	150.00
09/16/05	Follow up with K. Drew re: follow up with D. Levithan and review of		

3	documents at NJDEP pursuant to OPRA requests. M. Waller	0.2	75.00
09/16/05	Draft memorandum to R. Senftleben and W. Jacobson regarding review of files re: asbestos contamination by Sadat firm.		
3	M. Waller	0.1	37.50
09/16/05	Follow up with W. Jacobson and exchange e-mails re: firm conducting site cleanup and forwarding environmental cleanup chronology.		
3	M. Waller	0.4	150.00
09/16/05	Follow up with W. Jacobson re: costs of cleanup, research same and provide information.		
3	M. Waller	0.4	150.00
09/16/05	Review and analyze memorandum of law in support of stay prepared by counsel for R. Bettacchi, prepare general comments and forward to T. Frongillo.		
3	M. Waller	0.7	262.50
09/16/05	Telephone conferences with V. Broderick re: form and filing of motion to stay and provide forms to same.		
3	M. Waller	0.4	150.00
09/16/05	Working with document review team re: chronologies and review documents to be included in same.		
3	M. Waller	1.2	450.00
09/16/05	Organize and review client documents for the purposes of preparing a chronology regarding key events and documents, confer with M. Waller re: same.		
3	S. Muhlstock	3.1	837.00
09/16/05	Reviewed, categorized and organized documents provided by WR Grace, and managed document sets to aid with responses to subpoenas and preparation for other document requests.		
3	A. Stahl	1.7	323.00
09/16/05	Sort new discovery materials from original production into more specified categories, with focus on new subpoena.		
3	J. Mandel	2.2	594.00
09/16/05	Database entry of documents.		
14	C. Atkins	7.0	595.00
09/16/05	Review documents regarding Trenton plant operations and separate by		

14	category, preparing summary of documents, follow up with M. Waller. R. McCaffrey	7.0	1,190.00
09/16/05	Review, analysis, and sorting of documents for purposes of compiling a chronology of events relevant to the Federal investigation.		
14	G. Hammoud	8.5	1,657.50
09/16/05	Document review, analysis and coding into database.		
14	C. Warnke	6.4	928.00
09/17/05	Review documents to be included in topical chronologies for 9/26 meeting.		
3	M. Waller	1.0	375.00
09/17/05	Review client documents for purposes of preparing chronology and presentation regarding key events and documents.		
3	S. Muhlstock	2.4	648.00
09/17/05	Reviewed documents in preparation for drafting summary.		
3	J. Spielberg	4.3	1,032.00
09/17/05	Reviewing asbestos and governmental inspection documents to compile a comprehensive and concise summary of air monitoring and employee medical testing at the Trenton location.		
3	A. Stahl	5.9	1,121.00
09/17/05	Document review, analysis and coding in Summation database.		
14	Y. Day	4.0	440.00
09/17/05	Substantive review of documents regarding Trenton plant operations. Begin preparing summary of documents.		
14	R. McCaffrey	4.0	680.00
09/18/05	Review documents and draft chronologies.		
3	M. Waller	3.6	1,350.00
09/18/05	Continued to review documents and prepare summary.		
3	J. Spielberg	4.1	984.00
09/18/05	Preparing chronology of key events and client documents.		
3	S. Muhlstock	3.5	945.00
09/18/05	Review documents and database entry.		
14	C. Atkins	4.0	340.00
09/19/05	Review draft Verified Complaint for Declaratory and Injunctive Relief.		
14	S. Zuber	0.7	262.50

09/19/05	Follow up with M. Waller re: revised draft of Motion for Declaratory and Injunctive Relief.		
14	S. Zuber	0.7	262.50
09/19/05	Work with M. Waller regarding Complaint and 105 Motion, each seeking declaratory and injunctive relief.		
14	S. Zuber	0.4	150.00
09/19/05	Review e-mails and follow up re: Federal Subpoena; work with attorneys re: discovery issues; review and forward removal papers.		
14	A. Marchetta	1.2	630.00
09/19/05	Review e-mail from W. Jacobson re: ATSDR report re: study of expansion plants and follow up memo from R. Senfleben forwarding statement from ATSDR re: same.		
3	M. Waller	0.3	112.50
09/19/05	Finalize removal papers with A. Marchetta and attend to service and filing and forward same by e-mail to all counsel.		
3	M. Waller	0.7	262.50
09/19/05	Review e-mail and attached subpoena issued by federal prosecutors from L. Urgenson and follow up with M. Morgan re: response by category.		
3	M. Waller	0.4	150.00
09/19/05	Meeting with M. Morgan regarding presentation, issues, and arrangements for 9/26 strategy meeting with client and co-counsel.		
3	M. Waller	0.8	300.00
09/19/05	Follow up with W. Jacobson regarding subjects and scheduling for 9/26 strategy meeting.		
3	M. Waller	0.2	75.00
09/19/05	Follow up with substantive review team regarding chronology and review entries and documents for inclusion in same.		
3	M. Waller	0.4	150.00
09/19/05	Follow up with S. Zuber regarding review of 105 Motion to Stay New Jersey Action.		
3	M. Waller	0.2	75.00
09/19/05	Review and analyze 105 motion and confirm penalty and other factual assertions therein.		
3	M. Waller	0.7	262.50

09/19/05	Review comments to 105 motion by E. McTiernan and J. Baer and refer back to initial draft.		
3	M. Waller	0.3	112.50
09/19/05	Follow up re: conducting of additional employee interviews.		
3	M. Waller	0.1	37.50
09/19/05	Draft memorandum to S. Engel forwarding comments to 105 motion papers.		
3	M. Waller	0.2	75.00
09/19/05	Review revised removal papers from L. Sinanyan incorporating all comments.		
3	M. Waller	0.3	112.50
09/19/05	Review several e-mails from V. Broderick regarding form and filing of motion to stay and, with M. Morgan, respond to same.		
3	M. Waller	0.3	112.50
09/19/05	Review e-mail from S. Engel and attached memorandum in support of motion to stay and adversary complaint, noting suggested revisions, follow up with S. Zuber re: review of same.		
3	M. Waller	2.1	787.50
09/19/05	Telephone conference with V. Broderick regarding filing motion to stay.		
3	M. Waller	0.1	37.50
09/19/05	Confer with A. Marchetta regarding 9/26 strategy meeting at K&E.		
3	M. Waller	0.4	150.00
09/19/05	Assist S. Engel with exhibit to 105 motion.		
3	M. Waller	0.2	75.00
09/19/05	Follow up with J. Mandel and review information re: status of interviews for PI to follow up.		
3	M. Waller	0.2	75.00
09/19/05	Review and respond to memo from L. Sinanyan re: preparation and filing of motion to transfer venue.		
3	M. Waller	0.2	75.00
09/19/05	Review e-mail and attached subpoena issued by federal prosecutors from L. Urgenson and follow up with M. Waller re: response by category.		
14	M. Morgan	0.4	80.00
09/19/05	Work with M. Waller re: issues and arrangements for the 9/26 meeting.		

14	M. Morgan	0.8	160.00
09/19/05	Continued to review documents and prepare summary.		
3	J. Spielberg	2.8	672.00
09/19/05	Work with S. Muhlstock re: summary of documents.		
3	J. Spielberg	0.3	72.00
09/19/05	Review documents and summarize same for master chronology of site and major events.		
3	J. Mandel	4.1	1,107.00
09/19/05	Reviewing asbestos and governmental inspection documents to compile a comprehensive and concise summary of air monitoring and employee medical testing at the Trenton location.		
3	A. Stahl	1.1	209.00
09/19/05	Meeting with S. Muhlstock and the document review team to discuss issues with the review and summarization of documents, and to the specific manner to chart the summaries.		
3	A. Stahl	0.3	57.00
09/19/05	Work with S. Muhlstock regarding preparation of chronologies.		
3	J. Mandel	0.1	27.00
09/19/05	Review client documents and prepare chronology regarding key events and documents.		
3	S. Muhlstock	6.6	1,782.00
09/19/05	Document review, analysis and coding in Summation database.		
14	Y. Day	6.3	693.00
09/19/05	Review documents and database entry.		
14	C. Atkins	4.0	340.00
09/19/05	Review, analysis, and sorting of documents for purposes of compiling a chronology of events relevant to the criminal investigation.		
14	G. Hammoud	9.2	1,794.00
09/19/05	Meeting re: status of chronology project and future strategy.		
14	G. Hammoud	0.3	58.50
09/19/05	Review documents regarding Trenton Plant performance for summary. Meeting with S. Muhlstock and document review team. Separate documents into categories by relevance.		
14	R. McCaffrey	7.0	1,190.00



09/19/05	Document review, analysis and coding into database.		
14	C. Warnke	6.3	913.50
09/20/05	Participate in conference call with R. Senftleben, W. Jacobson, A. Marchetta, and M. Morgan regarding 9/26 meeting and subpoena response.		
3	M. Waller	0.6	225.00
09/20/05	Follow up with M. Morgan regarding filing of removal papers and certificate of service.		
3	M. Waller	0.2	75.00
09/20/05	Review transfer of venue rules in response to request from L. Sinanyan and memo to S. DelPurcio re: research regarding same.		
3	M. Waller	0.3	112.50
09/20/05	Confer with S. Muhlstock and attorneys regarding status of preparation of chronology re: site for 9/26 meeting with the client.		
3	M. Waller	0.3	112.50
09/20/05	Meeting with DelPurcio and review results of research re: transfer motions and draft e-mail memorandum to L. Sinanyan regarding same.		
3	M. Waller	0.5	187.50
09/20/05	Follow up with M. Donohue regarding staffing.		
3	M. Waller	0.2	75.00
09/20/05	Meeting with M. Morgan regarding coding issues and suggested revisions to key topics and follow up with Y. Day regarding same.		
3	M. Waller	0.4	150.00
09/20/05	Reviewing documents from substantive review team re: inclusion in chronologies and follow up with M. Morgan and S. Muhlstock re: same.		
3	M. Waller	3.7	1,387.50
09/20/05	Follow up regarding motion to transfer venue.		
14	S. Zuber	0.3	112.50
09/20/05	Conference call with client and attorneys and follow up re: subpoenas; telephone call to Deputy Attorney General Bonnanno re: same.		
14	A. Marchetta	1.0	525.00
09/20/05	Reviewing asbestos and governmental inspection documents to compile a comprehensive and concise summary of air monitoring and employee medical testing at the Trenton location.		
3	A. Stahl	7.9	1,501.00

09/20/05	Meeting with litigation team regarding category summaries; and conference with S. Muhlstock on same.		
3	J. Mandel	0.4	108.00
09/20/05	Review documents and summarize same for master document setting forth chronology of site and major events, with focus on NJDEP permit documents and related memoranda and correspondence.		
3	J. Mandel	4.3	1,161.00
09/20/05	Review client documents and prepare chronology regarding key events and documents.		
3	S. Muhlstock	5.2	1,404.00
09/20/05	Work with M. Waller regarding chronology of key events and documents.		
3	S. Muhlstock	0.8	216.00
09/20/05	Prepare for and participate in conference call with Rick Sentfleben, W. Jacobson, M. Waller and A. Marchetta.		
14	M. Morgan	1.0	200.00
09/20/05	Work with M. Waller regarding coding of documents.		
14	M. Morgan	0.2	40.00
09/20/05	Work with M. Waller regarding formulation of case chronology.		
14	M. Morgan	0.2	40.00
09/20/05	Continued to review documents and prepare summary.		
3	J. Spielberg	9.0	2,160.00
09/20/05	Conference with M. Waller re: document review.		
3	J. Spielberg	0.2	48.00
09/20/05	Document review, analysis, and coding into Summation database.		
14	Y. Day	4.2	462.00
09/20/05	Review civil complaint, locate and organize documents referenced therein for Attorney review.		
14	Y. Day	2.0	220.00
09/20/05	Review documents and database entry.		
14	C. Atkins	3.0	255.00
09/20/05	Document review, analysis and coding into database.		
14	N. Jaouen	7.5	675.00

09/20/05	Review, analysis, and sorting of documents for purposes of compiling a chronology of events relevant to the criminal investigation.		
14	G. Hammoud	7.4	1,443.00
09/20/05	Meeting with M. Waller re: current status of chronology project		
14	G. Hammoud	0.3	58.50
09/20/05	Substantive review of documents for summary of plant performance documents. Meeting with M. Waller and document review team to discuss project.		
14	R. McCaffrey	8.0	1,360.00
09/20/05	Document review, analysis and coding into database.		
14	C. Warnke	6.1	884.50
09/21/05	Review memorandum from J. Baer re: removal papers, have same scanned and forward with e-mail message.		
3	M. Waller	0.3	112.50
09/21/05	Draft e-mail memorandum to L. Sinanyan re: assignment of judge and magistrate judge, and review reply re: distribution of transfer motion.		
3	M. Waller	0.2	75.00
09/21/05	Review e-mail memo from J. Baer regarding motion to transfer.		
3	M. Waller	0.1	37.50
09/21/05	Reviewing documents for inclusion in chronologies with substantive review team and identify documents for presentation at 9/26 strategy meeting.		
3	M. Waller	1.4	525.00
09/21/05	Confer with M. Morgan regarding format and issues for Power Point presentation for 9/26 strategy meeting with client and co-counsel.		
3	M. Waller	0.5	187.50
09/21/05	Review memorandum from W. Jacobson regarding call with AUSA Calcagni regarding the Grand Jury subpoena and scope of document production.		
3	M. Waller	0.2	75.00
09/21/05	Review motion filed by co-counsel re: interviews of employees in Montana case and follow up with M. Morgan regarding same.		
3	M. Waller	0.4	150.00
09/21/05	Confer with S. Muhlstock regarding key topics for chronology and follow up re: preparation of draft of same.		
3	M. Waller	0.3	112.50

09/21/05	Follow up with M. Morgan re: database coding issues.		
3	M. Waller	0.2	75.00
09/21/05	Work with M. Waller re: format and issues for Power Point presentation.		
7	M. Morgan	0.5	100.00
09/21/05	Meeting with S. Muhlstock and team re: status of document review.		
3	J. Spielberg	0.4	96.00
09/21/05	Continued to review documents and prepare summary.		
3	J. Spielberg	3.8	912.00
09/21/05	Conference with discovery team regarding master index of results of topic summaries.		
3	J. Mandel	0.4	108.00
09/21/05	Prepare summaries of all documents assigned to permits and storm water preparing chronology re: same.		
3	J. Mandel	5.5	1,485.00
09/21/05	Complete review of documents for purposes of preparing chronology of key events and documents.		
3	S. Muhlstock	3.6	972.00
09/21/05	Meeting with members of team involved in preparing chronology of key events and documents.		
3	S. Muhlstock	0.5	135.00
09/21/05	Review and revise master chronology of key events and documents.		
3	S. Muhlstock	2.1	567.00
09/21/05	Conferences with M. Waller regarding chronology of key events and documents.		
3	S. Muhlstock	0.3	81.00
09/21/05	Reviewing asbestos and governmental inspection documents to compile a comprehensive and concise summary of air monitoring and employee medical testing at the Trenton location.		
3	A. Stahl	3.0	570.00
09/21/05	Document review, analysis, and coding into Summation database.		
14	Y. Day	6.8	748.00
09/21/05	Review documents and database entry.		
14	C. Atkins	3.0	255.00

09/21/05	Document review, analysis and coding into database		
14	N. Jaouen	8.0	720.00
09/21/05	Document review, analysis and coding into database.		
14	K. Yates	8.5	765.00
09/21/05	Review, analysis, and sorting of documents for purposes of compiling a chronology of events relevant to the criminal investigation.		
14	G. Hammoud	9.0	1,755.00
09/21/05	Meeting re: current status of chronology project and coordination of efforts to combine separate topics into one chronology.		
14	G. Hammoud	0.2	39.00
09/21/05	Summarize plant performance documents. Meeting with document review team. Combine summaries from all subjects into one list of documents. Combine where necessary and eliminate duplicative documents. Numerous discussions with S. Muhlstock and other persons preparing summaries.		
14	R. McCaffrey	9.0	1,530.00
09/21/05	Document review, analysis and coding into database.		
14	C. Warnke	1.2	174.00
09/22/05	Review chronology prepared by substantive review team, prepare additions and revisions to same and begin identifying documents for Power Point presentation and follow up with document review team re: inclusion of additional items.		
3	M. Waller	3.2	1,200.00
09/22/05	Receive telephone call from DAG Dickinson re: removal procedure and arguments.		
3	M. Waller	0.3	112.50
09/22/05	Receive documents from J. Baer re: 105 motion and draft memo to DAG Dickinson and forward bankruptcy court order and 105 motion papers.		
3	M. Waller	0.3	112.50
09/22/05	Review expanding plant documents from Y. Day and respond re: coding and entry of same in database.		
3	M. Waller	0.2	75.00
09/22/05	Draft memorandum to P. Herzberg regarding review of material received from DEP re: asbestos at other contaminated sites and remediation re: same compared to Hamilton site.		
3	M. Waller	0.2	75.00

09/22/05	Review RJ Lee subpoena from W. Jacobson.		
3	M. Waller	0.2	75.00
09/22/05	Working with M. Morgan regarding finalizing chronology and documents for power point presentation for 9/26 presentation.		
3	M. Waller	1.2	450.00
09/22/05	Meeting with M. Morgan regarding review and coding materials re: only Trenton plant and follow up with Y. Day.		
3	M. Waller	0.3	112.50
09/22/05	Draft memos to A. Marchetta, co-counsel and the client re: call from DAG Dickinson.		
3	M. Waller	0.4	150.00
09/22/05	Follow up re: telephone call from Dickerson and statute of limitation issues re: Calcagni; review chronology for client.		
14	A. Marchetta	0.8	420.00
09/22/05	Continue to review and revise chronology of key documents and events and incorporate entries into chronology.		
3	S. Muhlstock	3.4	918.00
09/22/05	Work with W. Waller and M. Morgan regarding chronology and preparation for meeting with client and co-counsel.		
3	S. Muhlstock	0.7	189.00
09/22/05	Work with M. Waller and S. Muhlstock re: the chronology and documents in anticipation of 9/26 meeting in DC.		
14	M. Morgan	1.2	240.00
09/22/05	Reviewed documents for responsiveness to subpoena.		
3	J. Spielberg	1.3	312.00
09/22/05	Reviewed, categorized and organized documents provided by Grace, for response to subpoenas.		
3	A. Stahl	1.2	228.00
09/22/05	Reviewing asbestos and governmental inspection documents to compile a comprehensive and concise summary of air monitoring and employee medical testing at the Trenton location.		
3	A. Stahl	0.9	171.00
09/22/05	Meet with M. Waller regarding identifying responsive Trenton documents.		
14	Y. Day	0.1	11.00

09/22/05	Review documents received from Holmes Roberts to determine which boxes contain Trenton related material.		
14	Y. Day	4.0	440.00
09/22/05	Review documents and database entry.		
14	C. Atkins	1.0	85.00
09/22/05	Document review, analysis and coding into database.		
14	K. Yates	9.5	855.00
09/22/05	Document review, analysis, and coding into database.		
14	N. Jaouen	8.0	720.00
09/22/05	Adding citation and description of documents listed in chronology.		
14	G. Hammoud	4.5	877.50
09/22/05	Document review, analysis and coding into database.		
14	G. Hammoud	4.5	877.50
09/22/05	Review additional documents for inclusion in summary. Separate documents by relevant categories. Review documents for responsiveness to subpoena from New Jersey Attorney General.		
14	R. McCaffrey	9.0	1,530.00
09/22/05	Follow up with M. Morgan about document review, analysis and coding into database.		
14	C. Warnke	0.3	43.50
09/23/05	Follow up with S. Muhlstock and document review team regarding preparation of master chronology.		
3	M. Waller	0.3	112.50
09/23/05	Review master chronology.		
3	M. Waller	0.6	225.00
09/23/05	Review rough draft of presentation for 9/23 meeting with client.		
3	M. Waller	0.4	150.00
09/23/05	Confer with M. Morgan regarding master chronology and preparation for presentation for client on 9/23		
3	M. Waller	0.4	150.00
09/23/05	Review e-mail re: T. Frongillo granting additional time to state to respond to motion to say and profit motive for fraud theory and forward same with comment to litigation team.		

3	M. Waller	0.2	75.00
09/23/05	Follow up with M. Morgan re Deputy Attorney General subpoena; review re strategy and issues re same.		
14	A. Marchetta	0.4	210.00
09/23/05	Work with M. Morgan re presentation for clients re strategy meeting.		
14	A. Marchetta	0.6	315.00
09/23/05	Review OPRA documents re: other N.J. asbestos sites.		
3	P. Herzberg	1.5	592.50
09/23/05	Reviewing chronology and documents for inclusion in same for presentation at 9/26 strategy meeting.		
3	M. Waller	2.6	975.00
09/23/05	Prepare for meeting at Kirkland & Ellis's DC office with M. Waller.		
14	M. Morgan	4.2	840.00
09/23/05	Follow up with M. Waller and work with same to prepare for meeting at Kirkland & Ellis's DC office.		
14	M. Morgan	2.3	460.00
09/23/05	Meeting with N. Susalis and J. O'Reilly regarding witness interviews of former employees.		
14	M. Morgan	0.8	160.00
09/23/05	Reviewed documents and prepare chronology in preparation for presentation.		
3	J. Spielberg	1.1	264.00
09/23/05	Meeting with document review team re: document review and presentation.		
3	J. Spielberg	0.2	48.00
09/23/05	Review and revise chronology of key events and documents. Review responses to issues raised by M. Waller. Collect documents to be used in presentation to client and co-counsel.		
3	S. Muhlstock	4.3	1,161.00
09/23/05	Emails with Y. Day regarding review and coding of client documents.		
3	S. Muhlstock	0.1	27.00
09/23/05	Reviewed, categorized and organized documents provided by WR Grace, and managed document sets to aid with responses to subpoenas and preparation for other document requests.		
3	A. Stahl	0.7	133.00



09/23/05	Reviewed comments of M. Waller to chronology of Grace's documents, and information contained therein; prepared responses to comments for discussion in scheduled meeting.		
3	A. Stahl	1.2	228.00
09/23/05	Reviewed, categorized and organized documents provided by WR Grace, and managed document sets to aid with responses to subpoenas and preparation for other document requests.		
3	A. Stahl	0.3	57.00
09/23/05	Meeting with M. Morgan and document review team to discuss chronology sub-set and the preparation of the powerpoint presentation.		
3	A. Stahl	0.2	38.00
09/23/05	Meeting with discovery team regarding chronology chart and supporting documents.		
3	J. Mandel	0.2	54.00
09/23/05	Review documents received from Holmes Roberts to determine which boxes contain Trenton related material.		
14	Y. Day	6.8	748.00
09/23/05	Document review, analysis and coding into database		
14	N. Jaouen	7.0	630.00
09/23/05	Document review, analysis and coding into database.		
14	K. Yates	8.5	765.00
09/23/05	Substantive review of documents for inclusion in summary. Update summary. Review documents and separate by relevant categories. Meeting with M. Morgan and document review team.		
14	R. McCaffrey	6.0	1,020.00
09/23/05	Meeting with document review team re: chronology.		
14	G. Hammoud	0.2	39.00
09/23/05	Compiled documents utilized in subset of chronology.		
14	G. Hammoud	1.0	195.00
09/23/05	Document review, analysis and coding into database.		
14	G. Hammoud	1.0	195.00
09/23/05	Review of documents and editing of chronology for preparation of presentation.		
14	G. Hammoud	2.5	487.50

09/24/05	Document review, analysis and coding into database.		
14	K. Yates	4.0	360.00
09/25/05	Reviewing master chronology and Power Point presentation for meeting with client and co-counsel on 9/26 and working with M. Morgan to finalize same and prepare exhibits for meeting.		
3	M. Waller	7.7	2,887.50
09/25/05	Prepare power point presentation of documents related to claims and defenses with M. Waller in anticipation of meeting at Kirkland & Ellis's DC office.		
14	M. Morgan	9.0	1,800.00
09/25/05	Review documents received from Holmes Roberts to determine which boxes contain Trenton related material.		
14	Y. Day	2.5	275.00
09/26/05	Review Johns-Manville documents re: alleged asbestos levels.		
3	P. Herzberg	2.2	869.00
09/26/05	E-mail to M. Waller re: Johns-Manville documents re: asbestos.		
3	P. Herzberg	0.4	158.00
09/26/05	Review and analysis of draft Transfer Motion.		
14	S. Zuber	0.8	300.00
09/26/05	Confer with S. Muhlstock regarding draft Transfer Motion.		
14	S. Zuber	0.2	75.00
09/26/05	Prepare memo to L. Sinanyan regarding proposed modifications to draft Transfer Motion.		
14	S. Zuber	0.7	262.50
09/26/05	Review comments by various counsel to draft Transfer Motion.		
14	S. Zuber	0.2	75.00
09/26/05	Finalizing presentation and preparation with M. Morgan for meeting with client and co-counsel.		
3	M. Waller	2.0	750.00
09/26/05	Meeting with client and co-counsel re: status, strategy, tolling agreement, and other issues.		
3	M. Waller	9.3	3,487.50
09/26/05	Follow up with M. Muhlstock regarding preparation of motion to transfer		

3	venue, follow up with L. Sinanyan, and proposed changes by D. Hird. M. Waller	0.4	150.00
09/26/05	Meeting with S. Muhlstock and the document review team to discuss a plan of action for the 21 remaining boxes of documents to be reviewed for responsiveness to subpoenas.		
3	A. Stahl	0.3	57.00
09/26/05	Reviewed, categorized and organized documents provided by Grace, to determine responsiveness to subpoenas.		
3	A. Stahl	3.4	646.00
09/26/05	Review draft of motion to transfer venue and emails regarding same.		
3	S. Muhlstock	0.6	162.00
09/26/05	Work with M. Waller and S. Zuber regarding motion to transfer venue.		
3	S. Muhlstock	0.2	54.00
09/26/05	Draft notice of motion, proposed form of order and format brief for motion to transfer venue.		
3	S. Muhlstock	0.9	243.00
09/26/05	Work on continued organization of client documents and review for responsiveness to subpoenas.		
3	S. Muhlstock	0.3	81.00
09/26/05	Continue organization of client documents and review for responsiveness to subpoenas.		
3	S. Muhlstock	2.6	702.00
09/26/05	Work on production re: fourth subpoena and new boxes.		
3	J. Mandel	0.3	81.00
09/26/05	Prepare for meeting at Kirkland & Ellis's DC office with M. Waller.		
14	M. Morgan	2.0	400.00
09/26/05	Meeting with W. Jacobson, T. Mace, R. Senfleben and M. Waller regarding response to subpoenas.		
14	M. Morgan	1.7	340.00
09/26/05	Meeting with D. Siegel, M. Shelnitz, R. Senfleben, M. Waller, W. Jacobson, L. Urgenson, T. Mace at Kirkland & Ellis's DC office.		
14	M. Morgan	9.3	1,860.00
09/26/05	Reviewed documents for responsiveness to subpoena.		
3	J. Spielberg	5.3	1,272.00

09/26/05	Review documents received from Holmes Roberts to determine which boxes contain Trenton related material.		
14	Y. Day	6.3	693.00
09/26/05	Review documents, analyze and code into Summation database.		
14	Y. Day	0.5	55.00
09/26/05	Document review, analysis and coding into database		
14	N. Jaouen	8.0	720.00
09/26/05	Document review, analysis and coding into database.		
14	K. Yates	9.5	855.00
09/26/05	Review documents for responsiveness to subpoenas from New Jersey Attorney General. Separate documents into categories by relevance.		
14	R. McCaffrey	7.5	1,275.00
09/26/05	Document review, analysis and coding into database.		
14	G. Hammoud	7.0	1,365.00
09/27/05	Exchange e-mails with W. Jacobson regarding factual presentation, supplemental topical chronologies and Cintani depositions.		
3	M. Waller	0.3	112.50
09/27/05	Follow up with M. Morgan and S. Muhlstock regarding additional documents and micro-film "blowbacks" from HRO and review of documents at Cambridge and obtaining microfilms from B. O'Connell.		
3	M. Waller	0.4	150.00
09/27/05	Follow up memo to S. Zuber re: motion to transfer venue.		
3	M. Waller	0.1	37.50
09/27/05	Review finalized motion papers re: transfer from S. Muhlstock.		
3	M. Waller	0.2	75.00
09/27/05	Follow up with S. Muhlstock re: filing, review e-mails from L. Sinanyan and J. Baer regarding same and reply re: attempting to file same on short notice.		
3	M. Waller	0.4	150.00
09/27/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas and preparation for other document requests.		
3	A. Stahl	3.6	684.00

09/27/05	Review and categorize new boxes of documents for responsiveness to current subpoenas.		
3	J. Mandel	3.0	810.00
09/27/05	Emails with Y. Day regarding review and coding of client documents.		
3	S. Muhlstock	0.1	27.00
09/27/05	Conferences and follow up with M. Waller regarding motion to transfer venue.		
3	S. Muhlstock	0.3	81.00
09/27/05	Review revisions made to motion to transfer venue and incorporate same into final version. Revise notice of motion and proposed form of order.		
3	S. Muhlstock	1.2	324.00
09/27/05	Emails with M. Waller and L. Sinanyan regarding motion to transfer venue.		
3	S. Muhlstock	0.3	81.00
09/27/05	Conferences with M. Waller regarding review of client documents in Cambridge. Attention to arrangements for same.		
3	S. Muhlstock	0.4	108.00
09/27/05	Review of filing dates for transfer motion.		
14	M. Morgan	0.3	60.00
09/27/05	Begin compiling documents referred to in chronology as requested by K&E.		
14	M. Morgan	3.4	680.00
09/27/05	Further compile documents referenced in master chronology as requested by K&E.		
14	M. Morgan	2.1	420.00
09/27/05	Reviewed documents for responsiveness to subpoena.		
3	J. Spielberg	6.1	1,464.00
09/27/05	Document review, analysis and coding into Summation database.		
14	Y. Day	6.1	671.00
09/27/05	Document review, analysis and coding into database.		
14	M. Gironde	5.3	609.50
09/27/05	Document review, analysis and coding into database.		
14	K. Yates	7.5	675.00
09/27/05	Review documents for responsiveness to subpoenas from New Jersey Attorney General. Separate documents into categories by relevance.		

14	R. McCaffrey	7.0	1,190.00
09/27/05	Document review, analysis and coding into database.		
14	G. Hammoud	7.0	1,365.00
09/28/05	Review numerous correspondence among counsel regarding removal, remand and transfer issues.		
14	S. Zuber	0.3	112.50
09/28/05	Drafting memorandum to J. Baer and L. Sinanyan re: strategy re: filing motion to transfer venue.		
3	M. Waller	0.5	187.50
09/28/05	Working with S. Muhlstock regarding motion to transfer venue, timing, short notice, and relationship to other motions.		
3	M. Waller	0.8	300.00
09/28/05	Review depositions of J. Cintani.		
3	M. Waller	1.0	375.00
09/28/05	Draft e-mail message and forward news article regarding New Castle site.		
3	M. Waller	0.2	75.00
09/28/05	Telephone conference with N. Susalis re: conducting interviews and follow up with M. Morgan re: documents required by PI firm.		
3	M. Waller	0.7	262.50
09/28/05	Follow up with Y. Day regarding coding issues and relevant documents.		
3	M. Waller	0.3	112.50
09/28/05	Review letter from DAG Dickinson to Judge Jacobson noting removal and stating State intends to oppose same.		
3	M. Waller	0.1	37.50
09/28/05	Draft memo to co-counsel and client regarding letter from DAG Dickinson to Judge Jacobson noting removal and stating State intends to oppose same.		
3	M. Waller	0.2	75.00
09/28/05	Review e-mail from Y. Day regarding potential duplicate documents received from HRO.		
3	M. Waller	0.1	37.50
09/28/05	Preparing memo re: detailed chronologies with narratives following 9/26 meeting.		
3	M. Waller	0.5	187.50

09/28/05	Reviewing e-mail from L. Urgenson regarding request by AUSA Calcagni for additional time to toll matter and meetings with Grace and forward to A. Marchetta and litigation team.		
3	M. Waller	0.2	75.00
09/28/05	Review revised settlement documents from plaintiffs' counsel and compare same to initial drafts.		
3	M. Waller	0.7	262.50
09/28/05	Review letter from J. Dickinson to Judge Jacobsen and confer with M. Waller regarding same.		
3	S. Muhlstock	0.3	81.00
09/28/05	Further revisions to brief, notice of motion and proposed form of order for motion to transfer venue.		
3	S. Muhlstock	0.6	162.00
09/28/05	Conferences with, and draft email to, M. Waller regarding timing of filing of motion to transfer venue.		
3	S. Muhlstock	0.6	162.00
09/28/05	Review of Nick Susalis retainer agreement and compile documents and employee list to assist in witness interviews and meeting with M. Waller re: same.		
14	M. Morgan	1.8	360.00
09/28/05	Phone call with M. Waller and N. Susalis regarding witness interviews.		
14	M. Morgan	0.5	100.00
09/28/05	Begin preparing reply to plaintiffs' opposition to defendants' motion for summary judgment.		
14	M. Morgan	2.7	540.00
09/28/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas.		
3	A. Stahl	2.6	494.00
09/28/05	Document review, analysis and coding into Summation database.		
14	Y. Day	3.1	341.00
09/28/05	Select documents identified by attorneys and save to disk for production to co-counsel - Kirkland & Ellis.		
14	Y. Day	2.6	286.00
09/28/05	Document review, analysis and coding into database.		
14	K. Yates	8.5	765.00

09/28/05	Document review, analysis and coding into database.		
14	M. Gironde	8.5	977.50
09/28/05	Document review, analysis and coding into database.		
14	G. Hammoud	7.5	1,462.50
09/28/05	Review documents for responsiveness to subpoenas from New Jersey Attorney General. Separate documents into categories by relevance.		
14	R. McCaffrey	7.0	1,190.00
09/29/05	Review and respond to e-mail from J. Hughes regarding workers compensation file, and forward to J. Hughes presentation slides and chronology from 9/26 meeting;		
3	M. Waller	0.4	150.00
09/29/05	Forward latest chronology and Power Point slides to litigation team.		
3	M. Waller	0.1	37.50
09/29/05	Receive telephone call from E. Bonanno regarding production of documents.		
3	M. Waller	0.3	112.50
09/29/05	Draft memorandum to co-counsel and client regarding call from E. Bonanno regarding production of documents.		
3	M. Waller	0.2	75.00
09/29/05	Memo to M. Morgan and Y. Day regarding identification of plant level employees as witnesses for Grace.		
3	M. Waller	0.2	75.00
09/29/05	Follow up with Y. Day regarding preparation of report re: authors of memos at Trenton and review list to identify potential corporate witnesses.		
3	M. Waller	0.6	225.00
09/29/05	Telephone conference with W. Jacobson regarding response to federal subpoena and latest subpoena from State (E. Bonanno).		
3	M. Waller	0.3	112.50
09/29/05	Review letter from DAG Dickinson re: deemed withdrawal of motion to stay and draft memorandum to co-counsel and client regarding same.		
3	M. Waller	0.3	112.50
09/29/05	Meeting with M. Morgan regarding call with W. Jacobson, HRO document issues, and review of documents at Cambridge offices.		
3	M. Waller	0.8	300.00



09/29/05	Review additional Johns Mansville documents.		
3	P. Herzberg	1.0	395.00
09/29/05	Phone call with DAG Bonanno regarding response to Sept. 7 subpoena and follow-up with M. Waller regarding same.		
14	M. Morgan	0.9	180.00
09/29/05	Work with M. Waller re: call from Jacobson, HRO document issues and preparation for doc review in Cambridge.		
14	M. Morgan	0.8	160.00
09/29/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas.		
3	A. Stahl	2.3	437.00
09/29/05	Reviewed documents for responsiveness to subpoena.		
3	J. Spielberg	2.5	600.00
09/29/05	Document review, analysis and coding into database.		
14	M. Gironde	7.5	862.50
09/29/05	Document review, analysis and coding into database.		
14	K. Yates	7.1	639.00
09/29/05	Review documents for responsiveness to subpoena from New Jersey Attorney General. Separate documents into categories by relevance.		
14	R. McCaffrey	4.0	680.00
09/29/05	Document review, analysis and coding into database.		
14	G. Hammoud	5.0	975.00
09/29/05	Meeting with M. Morgan and S. Muhlstock re: Cambridge document review.		
14	G. Hammoud	0.2	39.00
09/30/05	Follow-up with all counsel regarding motion to transfer.		
3	M. Waller	0.2	75.00
09/30/05	Conferring with Mark Morgan regarding Cambridge document review.		
3	M. Waller	0.4	150.00
09/30/05	Review correspondence regarding status of motion to transfer venue and related matters.		
14	S. Zuber	0.3	112.50

09/30/05	Reviewed, categorized and organized documents provided by Grace, and managed document sets to aid with responses to subpoenas.		
3	A. Stahl	1.2	228.00
09/30/05	Review client documents in Cambridge with M. Morgan and G. Hammoud.		
3	S. Muhlstock	7.0	1,890.00
09/30/05	Review of Cambridge documents with S. Muhlstock and G. Hammoud and telephone conference with M. Waller re: same.		
14	M. Morgan	7.0	1,400.00
09/30/05	Reviewed documents for responsiveness to subpoena.		
3	J. Spielberg	3.4	816.00
09/30/05	Review documents and database entry.		
14	C. Atkins	3.0	255.00
09/30/05	Document review, analysis and coding into database.		
14	K. Yates	7.5	675.00
09/30/05	Document review, analysis and coding into database.		
14	M. Gironde	8.2	943.00
09/30/05	Review documents for responsiveness to subpoenas from New Jersey Attorney General. Separate documents by relevant categories.		
14	R. McCaffrey	7.0	1,190.00
09/30/05	Further document review in Cambridge with M. Morgan and S. Muhlstock.		
14	G. Hammoud	6.5	1,267.50

## FEE SUMMARY - SORTED BY TIMEKEEPER

<u>Timekeeper</u>	<u>TASK</u> <u>CODE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEE</u>
P. Herzberg	14	1.9	395.00	750.50
	3	5.6	395.00	2,212.00
A. Marchetta	14	16.1	525.00	8,452.50
M. Waller	3	132.8	375.00	49,800.00
S. Zuber	14	16.3	375.00	6,112.50
M. Gironde	14	29.5	115.00	3,392.50
N. Jaouen	14	38.5	90.00	3,465.00
K. Yates	14	70.6	90.00	6,354.00
G. Hammoud	14	157.7	195.00	30,751.50
R. McCaffrey	14	156.2	170.00	26,554.00
M. Morgan	14	102.5	200.00	20,500.00

S. Muhlstock	3	71.4	270.00	19,278.00
A. Stahl	3	53.2	190.00	10,108.00
J. Mandel	3	39.3	270.00	10,611.00
J. Spielberg	3	44.8	240.00	10,752.00
Y. Day	14	104.9	110.00	11,539.00
C. Atkins	14	47.5	85.00	4,037.50
C. Warnke	14	34.6	145.00	5,017.00
TOTAL		1,123.4		229,687.00

Client: 082910 W.R. GRACE & CO.

Matter: 102292 Tahari, Ltd.

09/01/05	Work on/revise letter to A. Mack, counsel to Tahari, re letter agreement on Tahari's claim in bankruptcy		
3	B. Benjamin	0.4	156.00
09/01/05	Continued preparation of Memorandum of Law in support of Motion to Dismiss, including additional research re: attorneys' fees claims and bare legal conclusions as bases for causes of action		
3	M. Levison	3.2	960.00
09/02/05	Legal research re Law of the Case application to Motion to Dismiss Tahari's Third Party Claim		
3	B. Benjamin	1.6	624.00
09/02/05	Work on/revise Memorandum of Law in Support of Motion to Dismiss Tahari's Third Party Complaint		
3	B. Benjamin	1.7	663.00
09/02/05	Work on/revise Benjamin Affirmation in Support of Motion to Dismiss Tahari's Third Party Complaint		
3	B. Benjamin	1.1	429.00
09/06/05	Review Motion to Dismiss.		
14	A. Marchetta	0.4	210.00
09/06/05	Work on/revise Motion to Dismiss Tahari's Third Party Complaint - Memorandum of Law and Affidavit in Support of same		
3	B. Benjamin	1.6	624.00
09/08/05	Review Motion to Dismiss.		
14	A. Marchetta	0.4	210.00
09/08/05	Work on/revise Memorandum of Law in Support of Motion to Dismiss Tahari's Third Party Complaint		
3	B. Benjamin	0.7	273.00

09/09/05	Telephone conference with T. Michaels, C. Boubol's office (counsel for Trizec) re scheduling motion return date		
3	B. Benjamin	0.2	78.00
09/09/05	Telephone conference with R. Laudor (D. Rozenholc office) re scheduling return date for Motion to Dismiss Tahari Cross Claims		
3	B. Benjamin	0.1	39.00
09/09/05	Work on, revise and finalize Notice of Motion, Affidavit and Memorandum of Law in Support of Motion to Dismiss Tahari's Third Party Complaint		
3	B. Benjamin	1.6	624.00
09/16/05	Telephone conference with A. Mack, counsel for Tahari, re return date of motion to dismiss, oral argument, scheduling before Judge Tolub		
3	B. Benjamin	0.2	78.00
09/19/05	Review/analysis Tahari's Opposition Papers to Trizec's Motion to Dismiss Third Party Complaint Against Trizec		
3	B. Benjamin	0.3	117.00
09/19/05	Attention to changing return date of Motion to Dismiss before Judge		
3	B. Benjamin	0.1	39.00
09/20/05	Telephone conference with A. Mack, counsel for Tahari, re service of opposition papers and reply papers, appearance before Judge Tolub		
3	B. Benjamin	0.2	78.00
09/20/05	Review/analysis of Tahari's Affirmation in Opposition to Trizec's Motion to Dismiss re: possible arguments to be used against W.R. Grace's Motion to Dismiss		
3	M. Levison	0.3	90.00
09/21/05	Review prior Court Orders re Prior Action Pending argument and Law of the Case argument in support of motion to Dismiss Tahari's Third Party Complaint		
3	B. Benjamin	0.9	351.00
09/21/05	Telephone conference with A. Mack, counsel for Tahari re execution of Stipulation re effect of Automatic Stay and pursuing any judgment against Grace in Bankruptcy Court		
3	B. Benjamin	0.2	78.00
09/21/05	Initial preparation of Reply Memorandum of Law in Further Support of Motion to Dismiss		
3	M. Levison	1.4	420.00

09/21/05	Review/analysis of A. Mack's Affirmation in Opposition to W.R. Grace's Motion to Dismiss		
3	M. Levison	0.5	150.00
09/22/05	Telephone call and follow up re: briefing.		
14	A. Marchetta	0.4	210.00
09/22/05	Work on and revise Reply Memorandum of Law in Further Support of Motion to Dismiss Tahari's Third Party Complaint		
3	B. Benjamin	3.8	1,482.00
09/22/05	Draft correspondence to A. Mack, counsel for Tahari, re execution of Stipulation to proceed in Bankruptcy Court if judgment obtained		
3	B. Benjamin	0.2	78.00
09/22/05	Continued preparation of Reply Memorandum of Law in Further Support of W.R. Grace's Motion to Dismiss		
3	M. Levison	3.4	1,020.00
09/22/05	Review/analysis of Reply Affirmation in Further Support of Trizec's Motion to Dismiss		
3	M. Levison	0.3	90.00
09/23/05	Preparation for and Appearance at Oral Argument before Judge Tolub re Motion to Dismiss Tahari's Third Party Claims		
3	B. Benjamin	3.6	1,404.00
09/27/05	Draft correspondence to V. Finkelstein and A. Nagy re summary of appearance at return date for motion to dismiss, upcoming dates and outstanding discovery issues		
3	B. Benjamin	0.4	156.00
09/27/05	Preparation of status of Tahari's current discovery obligations and strategy going forward		
3	M. Levison	0.4	120.00
09/28/05	Confer with B. Benjamin regarding status of agreement providing for stay relief and that any judgment obtained by deemed a pre-petition claim.		
14	S. Zuber	0.2	75.00
09/29/05	Work on and revise Subpoena Duces Tecum to Tahari's accountants - Patrusky, Mintz and Semel		
3	B. Benjamin	0.3	117.00
09/29/05	Preparation of Subpoena Duces Tecum of Patrusky, Mintz & Semel		

3	M. Levison	1.1	330.00
09/30/05	Analysis of issues re: time to serve copies of Subpoena to Patrusky upon adversaries		
3	M. Levison	0.2	60.00
09/30/05	Preparation of correspondence to All Counsel re: enclosing copy of Subpoena to Patrusky		
3	M. Levison	0.1	30.00
09/30/05	Coordinate service of Subpoena to Patrusky		
3	M. Levison	0.2	60.00

## FEE SUMMARY - SORTED BY TIMEKEEPER

<u>Timekeeper</u>	<u>TASK CODE</u>	<u>HOURS</u>	<u>RATE</u>	<u>FEE</u>
A. Marchetta	14	1.2	525.00	630.00
S. Zuber	14	0.2	375.00	75.00
B. Benjamin	3	19.2	390.00	7,488.00
M. Levison	3	11.1	300.00	3,330.00
	TOTAL	<u>31.7</u>		<u>11,523.00</u>